

REMARKS

This is intended as a full and complete response to the Final Office Action dated August 11, 2004, having a shortened statutory period for response set to expire on November 11, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 1-6, 8-21 and 38-40 remain pending in the application and are shown above. Claims 3-14 have been cancelled by the Applicants and claims 1-6, 8-21 and 38-40 stand rejected by the Examiner. Reconsideration of the rejected claims is requested for reasons presented below.

Claims 1, 2, 10, 12, 38, and 39 are amended to clarify the invention. These amendments are not presented to distinguish a reference, thus, the claims as amended are entitled to a full range of equivalents if not previously amended to distinguish a reference.

The Examiner has indicated that portions of the Information Disclosure Statement (IDS) filed May 30, 2002 fails to comply with 37 CFR 1.98(a)(2). Specifically, in the IDS of April 9, 2002, a copy of the *Lee, et al.* (C24) reference was unavoidably omitted. Applicants have been unable to locate a copy of this reference and will timely submit when found.

Claims 1-6, 8-21 and 38-40 stand rejected under 35 U.S.C. §112, first paragraph, as failing to comply with the written description requirement. The Applicants have amended the claims to delete any limitation to a glass substrate or a glass support surface thereby obviating the rejection. Withdrawal of the rejection is respectfully requested.

Claims 1, 5 and 6 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Robertson, et al.*, U.S. Patent No. 5,380,566 in view of *Sato, et al.*, U.S. Patent No. 5,296,037. The Applicants respectfully traverse the rejection. *Robertson, et al.* does not teach or provide motivation for a heated substrate support. *Sato, et al.* discloses a heat source within a chamber, but provides no motivation or teaching to combine the heat source with the wafer holder (20). Further, *Sato, et al.* discloses in Figure 1b, a wafer holder (20), an upper electrode (15), and an upper electrode grounding arm (14)

that is adapted to be in contact with an insulating layer (11) of wafer (1) via a coil spring (13). If one skilled in the art would consider reference numerals 11, and 13-15 to be the substrate support, then the reference would teach away from any thermally insulative properties in the support. Additionally, if a heater was added, the substrate support could not consist essentially of a heater since the electrodes would also be formed in the substrate support. As mentioned earlier, if one skilled in the art would consider the wafer holder 20 as the substrate support member, the reference provides no teaching or motivation to add a heater to the wafer holder. One skilled in the art would also note that there is no disclosure of a moveable substrate support.

Therefore, the references, in combination, do not teach, show, or suggest an apparatus for material deposition on a substrate, comprising a chamber, a process gas distribution assembly within the chamber, a power source coupled to the chamber for establishing a plasma, and a movable substrate support member within the chamber, the moveable substrate support member consisting essentially of a heater and a substrate support surface thereon, the substrate support surface comprising a thermally insulating layer to support the substrate thereon, as recited in claim 1. Withdrawal of the rejection to claim 1, and claims 5 and 6, which depend thereon, and other claims which depend thereon, is respectfully requested.

Claims 1, 5 and 10 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Matsuda, et al.*, Japanese Patent Publication No. 08-181113A in view of *Sato, et al.*, U.S. Patent No. 5,296,037. Applicant respectfully traverses the rejection. *Sato, et al.* is discussed above, and the reference *Matsuda, et al.* does not teach a substrate support consisting essentially of a heater, as recited in claim 1. The invention of *Matsuda, et al.* discloses no heater or heat source and wafers (23) are supported on a lower electrode (25) by electrostatic force (See Paragraph [004] and [006]), which would add other electrodes and/or power sources to be manufactured into the substrate support.

Therefore, *Matsuda, et al.* and *Sato, et al.*, in combination, do not teach, show, suggest, or provide motivation for an apparatus for material deposition on a substrate, comprising a chamber, a process gas distribution assembly within the chamber, a power source coupled to the chamber for establishing a plasma, and a movable

substrate support member within the chamber, the moveable substrate support member consisting essentially of a heater and a substrate support surface thereon, the substrate support surface comprising a thermally insulating layer to support the substrate thereon, as recited in claim 1. Withdrawal of the rejection to claim 1, and claims 5 and 10, which depend thereon, and other claims which depend thereon, is respectfully requested.

Claims 12, 14, 17 and 18 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Matsuda, et al.*, Japanese Patent Publication No. 08-181113A in view of *Sato, et al.*, U.S. Patent No. 5,296,037, as applied to claims 1, 5 and 10 above, and further in view of *White, et al.*, U.S. Patent No. 5,352,294 on grounds that the combination of the references teach the apparatus as claimed. Applicant respectfully traverses the rejection. *Matsuda, et al.* and *Sato, et al.* are discussed above and provide either no motivation for a heater or no motivation to combine a heater within a substrate support. *White, et al.* discloses a heated substrate support but provides no motivation to add a thermally insulating layer to the substrate support as recited in claim 12, and claims dependent thereon. Further, *White, et al.* does not present an embodiment directed to electrically insulate the frame from any components comprising the chamber while in a processing position. The reference teaches a frame that is capable of receiving and/or retaining a bias equivalent to the bias applied to the substrate.

Therefore, the references, in combination, do not teach, show, suggest, or provide motivation for an apparatus for material deposition on a substrate, comprising a chamber, a process gas distribution assembly within the chamber, a power source coupled to the chamber for establishing a plasma, a movable substrate support member within the chamber, the moveable substrate support consisting essentially of a heater and a substrate support surface thereon, the substrate support surface comprising a thermally insulating layer to support the substrate thereon, and a frame disposed on the thermally insulating layer when raised by the movable substrate support to a processing position, the frame being electrically insulated from the chamber in said processing position, as recited by claim 12. Withdrawal of the rejection to claim 12, and claims dependent thereon is respectfully requested.

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In conclusion, the references cited by the Examiner, in combination, do not teach, show, or suggest the invention as claimed. In addition, the references do not provide motivation for adaptation that would enable one skilled in the art to make the invention as claimed.

Having addressed all issues set out in the Final Office Action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Keith M. Tackett
Registration No. 32,008
MOSER, PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicant(s)